

IN THE UNITED STATES DISTRICT COURT  
FOR THE NORTHERN DISTRICT OF ILLINOIS  
EASTERN DIVISION

SMART LOCAL 265 WELFARE FUND,	)	
<i>et al.</i> ,	)	
	)	CIVIL ACTION
Plaintiffs,	)	
	)	NO. 22 C 2591
vs.	)	
	)	JUDGE JORGE L. ALONSO
IN-STALL, INC., an Illinois corporation,	)	
	)	
Defendant.	)	

**MOTION FOR ENTRY OF DEFAULT AND JUDGMENT**

Plaintiffs, by their attorneys, and pursuant to Federal Rule of Civil Procedure Rule 55(b), move for entry of judgment by default against Defendant, IN-STALL, INC., an Illinois corporation, in the total amount of \$93,715.64, plus Plaintiffs' court costs and reasonable attorneys' fees in the amount of \$4,811.75.

On May 26, 2022, the Summons and Complaint was served on the Registered Agent (by tendering a copy of said documents to Julian Sintich) at his place of business (a copy of the Summons and Affidavit of Service is attached hereto). Therefore, Defendant's answer was due on June 16, 2022. As Defendant has failed to timely answer the Complaint, Plaintiffs respectfully request entry of default and judgment pursuant to F.R.Civ.P. Rule 55(b).

/s/ Catherine M. Chapman

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**CERTIFICATE OF SERVICE**

The undersigned, an attorney of record, hereby certifies that she electronically filed the foregoing document (Motion for Entry of Default and Judgment) with the Clerk of Court using the CM/ECF system, and further certifies that I have mailed the above-referenced document by United States Mail to the following non-CM/ECF participant on or before the hour of 5:00 p.m. this 7th day of October 2022:

Mr. Silvano Sintich, Registered Agent/President  
In-Stall, Inc.  
17 W. Burlington Avenue  
Western Springs, IL 60558-1630

/s/ Catherine M. Chapman

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